

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
v.) Cr. No.: 16-10233-RGS
)
)
DONNA M. ACKERLY,)
)
)
Defendant.)
)

GOVERNMENT'S ASSENTED-TO MOTION TO CONTINUE TRIAL DATE

The government respectfully moves to continue the April 12, 2022 trial in this matter until a date determined by the Court on or after June 23, 2022.¹ Defendant Donna Ackerly assents to this motion. The government also requests that pretrial deadlines be modified to continue the filing deadlines and final pretrial conference to dates aligned with the newly-scheduled trial date.

In support of this motion the government states that two government witnesses have business and personal conflicts with the April 12, 2022 trial date. Counsel for two other government witnesses also has a vacation planned beginning on or about April 14, 2022. Further, the undersigned counsel has an anticipated two to three week trial starting on May 2, 2022 which makes rescheduling for later in April difficult.

A brief continuance of the April 12, 2022 trial date will allow the parties “the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,” 18 U.S.C. §3161(h)(7)(B)(iv). The ends of justice served by granting the requested continuance and excluding the time period from April 12, 2022 until the newly assigned trial date from the speedy

¹ The parties have conferred and this start date would work for the parties and the witnesses, subject to the Court's availability.

trial clock, outweigh the best interests of the public and the defendant in a speedy trial pursuant to the Speedy Trial Act, 18 U.S.C. §§3161(h)(7)(B)(iv); (h)(7)(A).

WHEREFORE, the government respectfully requests that the Court continue the trial date until a date determined by the Court.

Respectfully submitted,

RACHAEL S. ROLLINS
United States Attorney

By: /s/ Mackenzie A. Queenin
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CERTIFICATE OF SERVICE

I, Mackenzie A. Queenin, hereby certify that on March 14, 2021, I served a copy of the foregoing on counsel of record in this case by electronic filing.

/s/ Mackenzie A. Queenin
MACKENZIE A. QUEENIN
Assistant U.S. Attorney